

FILED - GR

February 16, 2024 1:11 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY: KB SCANNED BY: JW / 2-16

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHIRLEY STARKS,

FELONY INFORMATION

Defendant.

/

The United States Attorney charges:

**Unlawful Use of a Communication Facility in Causing or Facilitating
the Commission of Felonies under the Controlled Substances Act**

On or about February 23, 2023, in Ingham County, in the Southern Division of the Western District of Michigan, and in Wayne County, in the Eastern District of Michigan, and elsewhere, the Defendant,

SHIRLEY STARKS,

knowingly and intentionally used a communication facility, namely, a cellular phone, in facilitating the commission of an act, or acts, constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1), that is, conspiracy to distribute, and possess with intent to distribute, a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 843(b)

21 U.S.C. § 843(d)(1)

FORFEITURE ALLEGATION

(Unlawful Use of a Communication Facility in Causing or Facilitating the Commission of Felonies under the Controlled Substances Act)

The allegations contained in this Felony Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 843(b), as set forth in this Felony Information, the Defendant,

SHIRLEY STARKS,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to:

PERSONAL PROPERTY: approximately \$70,000 in United States Currency seized on or about February 23, 2023 from luggage at the Detroit airport (Asset ID 23-DEA-700485).

If any of the property described above, as a result of any act or omission of the Defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

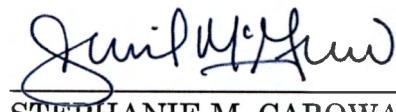
21 U.S.C. § 853(a)

21 U.S.C. § 853(p)

21 U.S.C. § 843(b)

MARK A. TOTTEN
United States Attorney

Date: February 16, 2024


for _____
STEPHANIE M. CAROWAN
AUSTIN J. HAKES
Assistant United States Attorneys